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To: DEP Rule Comments
Subject: Comment on Chapter 128: Advanced Clean Trucks Program

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We are not ready for this. I am an employee who works for a small business in the trucking industry, and recently went to a seminar on how electrifying the national truck fleet would affect America. It was eye opening. Two things being overlooked:

1) Electric trucks cannot carry the same payload as diesel trucks due to the weight of the batteries and road weight restrictions. This means more trips to transport the same amount of goods, thus increasing the cost of these goods dramatically. More trucks would need to be on the road, increasing the cost to the transport company and further clogging the roadways. Not to mention increased maintenance costs in tires, suspension parts, battery swaps, labor, etc. because the trucks will be forced to make multiple runs.

2) Where are you going to park all these charging trucks? Seriously, if the truck needs 8 hours to park and charge, where are you going to put them? This is not a trivial issue. Truck stops are overcrowded as it is, and there are not nearly enough charging stations for this transition. Where are they supposed to park when charging?

Bad idea, folks. Start getting ready for the transition, then gradually move into it. Do not jump feet first into the deep end. We are not ready. I support climate change remedial action (because at this stage, it is remedial), but be smart about it.

Your constituents are going to pay the price. I cannot afford an electric car, and I assure you, most blue collar workers cannot. Maine prides itself on supporting small businesses, but I see precious little of that in this move. Prices on goods will skyrocket from transportation costs and delays, and many will go under. Especially if they are competing with NH based businesses who are not under such restrictions.

In addition to these points:

- Public and private EV charging stations are limited and they are not equipped to handle heavy trucks.
- Investment in more expensive trucks, charging stations, and meeting the demand for power through transmission and delivery upgrades will cost Maine businesses, Maine taxpayers and Maine consumers.
- Remote locations for product delivery will be challenging along with routes that do not have charging capacity, such as rural Maine or new buildings.
- The trucking industry might feel differently about MHDV electrification if plans were in place to address Maine's needed grid upgrades to handle the additional electrical demand, nonexistent charging infrastructure that will result in supply chain chaos, and there was a plan to incentivize adoption of ZEV trucks due to their 3x higher cost to purchase than their clean diesel counterparts.

- MHDV electrification may be one of many solutions to consider in the future when Maine is ready for adoption. Taking a chance on adopting these mandates too early will have serious consequences for Mainers.
- New EV trucks are not currently equipped to handle additional equipment like snowplows, dump bodies, cranes, and other important tools.
- The range of new EV trucks, especially given Maine's cold weather climate, is a limiting factor for consumers and could create additional trucks needed for companies who have to meet product delivery schedules.
- Maine shouldn't allow California lawmakers to craft our regulations.
- Consumer choice to purchase the vehicle that meets their needs for commercial activity is important. Additionally, New Hampshire isn't moving to adopt it, meaning Maine businesses will be competing with other states that can offer more choices and solutions.
- The uncertainty of adopting the CA ACT before important questions are answered will create chaos in an already fragile supply chain, and consumers/taxpayers will end up paying higher prices.

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